The Honorable Marsha J. Pechman 2 3 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 ANA LOPEZ DEMETRIO and FRANCISCO No. 2:13-cv-01918-MJP EUGENIO PAZ, individually and on behalf of 11 all others similarly situated, DEFENDANT SAKUMA BROTHERS FARMS' RESPONSE TO MOTION FOR 12 Plaintiff, PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT 13 VS. 14 SAKUMA BROTHERS FARMS, INC., 15 Defendant. 16 Defendant Sakuma Brothers Farms Inc. ("Sakuma") does not oppose Plaintiffs' Motion 17 for Preliminary Approval of Class Action Settlement. That said, and as stated in the underlying 18 motion, Sakuma denies any wrongdoing or liability. Sakuma contends that if this matter were 19 litigated further, Plaintiffs would face significant obstacles to obtaining class certification and 20 establishing any liability. The risk faced by Plaintiffs and the putative class members of 21 proceeding with litigation confirms the fairness of this settlement. Sakuma respectfully joins 22 Plaintiffs in requesting that the Court grant preliminary approval for this class action settlement. 23 /// 24 /// 25 /// 26 **DEFENDANT SAKUMA BROTHERS** GRAHAM & DUNN PC FARMS' RESPONSE TO MOTION FOR Pier 70, 2801 Alaskan Way ~ Suite 300 Seattle, Washington 98121-1128 PRELIMINARY APPROVAL OF CLASS (206) 624-8300/Fax: (206) 340-9599 **ACTION SETTLEMENT -- 1**

No. 2:13-cv-01918-MJP

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DATED this 23rd day of June, 2014. <u>s/Adam S. Belzberg</u> Adam S. Belzberg, WSBA #41022 3 GRAHAM & DUNN PC Pier 70, 2801 Alaskan Way Ste 300 Seattle, WA 98121-1128 Tel: (206) 340-9654 Fax: (206) 340-9599 Email: abelzberg@grahamdunn.com 6 Attorneys for Defendant Sakuma Brothers Farms, 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23

DEFENDANT SAKUMA BROTHERS FARMS' RESPONSE TO MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT -- 2 No. 2:13-cv-01918-MJP

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CERTIFICATE OF SERVICE

The undersigned declares as follows: on the 23rd day of June, 2014, a copy of the foregoing document was served on counsel for plaintiffs, via the court's CM/ECF system, at the addresses set forth below.

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I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Seattle, Washington this 23rd day of June, 2014.

s/Adam S. Belzberg Adam S. Belzberg, WSBA #41022 **GRAHAM & DUNN PC** Pier 70, 2801 Alaskan Way Ste 300 Seattle, WA 98121-1128

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DEFENDANT SAKUMA BROTHERS FARMS' RESPONSE TO MOTION FOR PRELIMINARY APPROVAL OF CLASS **ACTION SETTLEMENT -- 3** No. 2:13-cv-01918-MJP

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